

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NEW YORK**

PV,  
*Plaintiff,*

v.

KRISTI NOEM, in her official capacity  
as Secretary of Homeland Security;  
U.S. DEPARTMENT OF HOMELAND  
SECURITY; and  
TODD LYONS, in his official capacity  
as Acting Director of U.S. Immigration  
and Customs Enforcement,  
*Defendants.*

Case No. 1:25-cv-00344

**Declaration of Plaintiff's attorney  
regarding TRO**

**DECLARATION OF PAUL O'DWYER**

PAUL O'DWYER declares as follows under penalty of perjury of the laws of the United States:

1. I am the attorney *pro hac vice* for Plaintiff in the above matter.
2. On April 21, 2025, I emailed Defendants' attorney, Adam Khalil, of the US Attorney's Office for the Western District of New York, with the Complaint and attached declarations as well as Plaintiff's Order to Show Cause for a TRO and supporting Memorandum of Law. I also provided Plaintiff's full name and identity so that they can investigate and respond to the Complaint.
3. I also informed Mr. Khalil that I would be filing the Order to Show Cause for a TRO this afternoon. Mr. Khalil states that Defendants are not consenting to the relief sought in the TRO.

Dated: New York, New York  
April 22, 2025

/s/ Paul O'Dwyer  
Paul O'Dwyer  
Attorney for Petitioner *pro hac vice*  
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